

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ALLIED IRISH BANKS, p.l.c.,	:	No. 03 Civ. 3748 (DAB) (GWG)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
BANK OF AMERICA, N.A. and	:	
CITIBANK, N.A.,	:	
	:	
Defendants.	:	
-----	X	
BANK OF AMERICA, N.A. and CITIBANK, N.A.,	:	
	:	
Counterclaim and Third-Party Plaintiffs,	:	
	:	
v.	:	
	:	
ALLIED IRISH BANKS, p.l.c.,	:	
	:	
Counterclaim-Defendant,	:	
	:	
and	:	
	:	
M&T BANK CORPORATION and MANUFACTURERS	:	
AND TRADERS TRUST COMPANY,	:	
	:	
Third-Party Defendants.	:	
-----	X	

**DECLARATION OF ALIDA Y. LASKER**

Pursuant to 28 U.S.C. § 1746, Alida Y. Lasker declares:

1. I am a member of the Bar of this Court and an associate of Cleary Gottlieb Steen & Hamilton LLP, counsel for defendant Citibank, N.A. ("Citibank").
2. I submit this declaration in support of Citibank's Motion to Strike AIB's Demand for Trial by Jury.

3. Attached are true and correct copies of the following documents as Exhibits A through UU.

<u>Exhibit</u>	<u>Document</u>
A	Memorandum of Law in Opposition to Defendants Bank of America, N.A. and Citibank, N.A.'s Motions to Dismiss the Complaint, dated Sept. 26, 2003
B	Excerpt from Deposition Tr. of Gregory K. Thoreson, dated May 27, 2009
C	Allied Irish Banks, p.l.c.'s Complaint, dated May 23, 2003
D	Allied Irish Banks, p.l.c.'s Amended Complaint, dated Oct. 22, 2009
E	Customer Agreement for Foreign Exchange Prime Brokerage Services, dated as of Sept. 1, 2000
F	International Foreign Exchange Master Agreement, dated as of Mar. 28, 2000; schedule signed Apr. 25, 2000
G	Excerpt from Deposition Tr. of Ralph Partlow, dated June 2, 2009
H	Letter from L.G. Birger to Hon. G.W. Gorenstein, dated June 3, 2009
I	Answer, Counterclaims and Third-Party Complaint of Citibank, N.A., dated Mar. 27, 2006
J	Letter from H. Zelbo to Hon. G.W. Gorenstein, dated May 28, 2009
K	Endorsed Memorandum of Hon. G. W. Gorenstein, so ordered June 5, 2009
L	Answer and Counterclaims to Amended Complaint and Amended Third-Party Complaint of Citibank, N.A., dated January 22, 2010
M	Demand for Jury Trial, dated April 10, 2006
N	Stipulation between AIB and BofA withdrawing AIB's Jury Demand, so ordered December 18, 2009
O	Email chain among E. Price, L. Diamond and J. Navotkoski, dated April 28, 2000

P Susan Todd, Bank Has New Name, The Morning Call, Apr. 15, 1999

Q Email from G. Garth to B. King, dated May 3, 2000

R B. King Notes, dated April 26, [2000]

S Advisor Authorization Agreement between BofA and Allfirst, dated Aug.30, 2000

T Email from R. Ray announcing J. Rusnak's promotion to Managing Director, dated June 1, 2001

U Excerpts from Deposition Tr. of C. Culp, dated January 5, 2012

V Foreign Exchange and Options Master Agreement Standard Form, dated Nov. 19, 1995

W Excerpt from Deposition Tr. Of Dr. David F. DeRosa, dated Jan. 11, 2012

X Expert Report of Dr. David DeRosa, dated Aug. 15, 2011

Y Expert Report of Richard A. Rua, dated Aug. 15, 2011

Z AIB's Response to Defendants' Interrogatory Concerning "Fake Trades," dated April 22, 2010

AA Expert Report of Christopher L. Culp, Ph.D, dated August 15, 2011

BB Facsimile from Citibank to Allfirst, Apr. 25, 2001

CC Expert Report of Riccardo Gomes, dated Aug. 15, 2011

DD Citibank, N.A.'s Responses to Plaintiff's Third Set of Requests for Admission, dated Dec. 3, 2010

EE Rebuttal Report of Christopher L. Culp, Ph.D., dated Oct. 28, 2011

FF Plaintiff's Objections and Responses to Defendants' Amended Interrogatories to Plaintiff Allied Irish Banks, p.l.c. Regarding Fake Trades and Phony Confirmations, dated Dec. 23, 2010

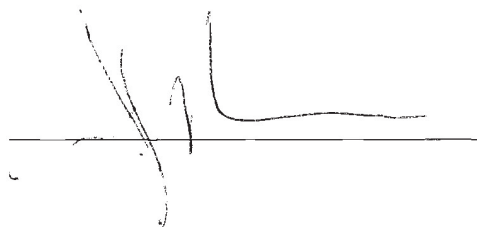
GG Email from J. Rusnak attaching proposed prime brokerage agreement, dated Sept. 6, 2000

HH First Maryland Bancorp's Funds Management Policy, dated January 20, 1998

- II Allfirst Financial Inc.'s Funds Management Policy, dated December 14, 1999
- JJ Allfirst Financial Inc.'s Funds Management Policy, dated January 23, 2001
- KK Ludwig Report investigation document entitled "Prime Accounts,"
- LL Foreign Exchange and Options Master Agreement ("FEOMA") between Merrill Lynch International Bank and First National Bank of Maryland, dated Mar. 14, 1997
- MM FEOMA between Bank of America National Trust and Savings Association and First National Bank of Maryland, dated May 5, 1998
- NN International Swap Dealers Association, Inc. ("ISDA") Master Agreement between Chemical Bank and First National Bank of Maryland, dated Oct. 15, 1992
- OO FEOMA between the Bank of New York and First National Bank of Maryland, dated Apr. 30, 1998
- PP ISDA Master Agreement between the Bank of New York and Allfirst Bank, dated Feb. 1, 2001
- QQ ISDA Master Agreement between First National Bank of Maryland and Franklin P. Perdue, dated May 10, 1996
- RR Email from J. Rusnak to R. Partlow, attaching IFEMA, dated Apr. 4, 2000
- SS Letter from J. Lang to M. Vogeles, dated June 28, 2010
- TT G. Garth notes on May 22, 2001 meeting with J. Rusnak and B. Ray
- UU Excerpt from Allfirst Financial Inc.'s Form 10-K, filed with the Securities & Exchange Commission, dated Apr. 1, 2002

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of January, 2012.

A handwritten signature in black ink, appearing to be 'JL', is written over a horizontal line.